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*Counsel for the Informal Noteholder Group*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re:</b>	:	<b>Chapter 11 Case No.</b>
	:	
<b>LEHMAN BROTHERS HOLDINGS INC., et al. :</b>	:	<b>Case No. 08-13555 (JMP)</b>
	:	
<b>Debtors. :</b>	:	<b>(Jointly Administered)</b>
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**VERIFIED STATEMENT OF  
AKIN GUMP STRAUSS HAUER & FELD LLP  
PURSUANT TO BANKRUPTCY RULE 2019**

**MICHAEL S. STAMER**, being duly sworn, deposes and says:

1. I am an attorney at law and a partner in the law firm of Akin Gump Strauss Hauer & Feld LLP (“Akin Gump”), which firm serves as counsel to an informal noteholder group (the “Informal Noteholder Group”) consisting of certain unaffiliated holders of senior and subordinated notes (the “Senior Notes” and “Subordinated Notes,” respectively) issued by Lehman Brothers Holdings Inc. I am the attorney at Akin Gump responsible for this engagement and have knowledge of Akin Gump’s representation of the Informal Noteholder Group in these chapter 11 cases. I make this verified statement on behalf of Akin Gump in accordance with Rule 2019 of the Federal Rules of Bankruptcy Procedure.

2. The members of the Informal Noteholder Group are:

Aegon USA  
230 West Monroe, Suite 1450  
Chicago, IL 60606

AIG Global Investment Group  
175 Water Street, 25<sup>th</sup> Floor  
New York, NY 10038

Alliance Bernstein  
1345 Ave of the Americas  
New York, NY 10105

Blackrock, Inc.  
40 East 52<sup>nd</sup> Street  
New York, New York 10022

Capital Guardian Trust Company  
11100 Santa Monica Blvd., 15<sup>th</sup> Floor  
Los Angeles, CA 90025-3384

Cyrus Capital Partners, L.P.  
399 Park Avenue, 39<sup>th</sup> Floor  
New York, NY 10022

Deutsche Bank Securities, Inc.  
60 Wall Street, 3<sup>rd</sup> Floor  
New York, NY 10015

King Street Capital Management, L.L.C.  
65 East 55<sup>th</sup> Street, 30<sup>th</sup> Floor  
New York, NY 10022

Pacific Management Investment Company  
840 Newport Center Drive  
Suite 300  
Newport Beach, CA 92660

Thrivent Financial For Lutherans  
625 Fourth Ave. S.  
Minneapolis, MN 55415-1665

Western Asset Management Company  
385 East Colorado Boulevard  
Pasadena, California 91101

Wexford Capital LLC  
411 West Putnam Avenue  
Greenwich, CT 06830

York Capital Management  
767 5<sup>th</sup> Avenue  
New York, New York 10153

3. Akin Gump has been advised by the members of the Informal Noteholder Group that, as of the date hereof, they collectively are the beneficial owner of, or the holder or manager of various accounts with investment authority, contractual authority or voting authority of, more than \$10.3 billion principal amount of Senior Notes and more than \$2.3 billion principal amount of Subordinated Notes.

Dated: New York, New York  
October 2, 2008

AKIN GUMP STRAUSS HAUSER & FELD LLP

By: /s/ Michael S. Stamer  
Michael S. Stamer  
590 Madison Avenue  
New York, New York 10022  
(212) 872-1000

Counsel for the Informal Noteholder Group

Sworn to before me this  
2<sup>nd</sup> day of October, 2008

/s/ Mildred Andino  
Notary Public, State of New York  
No. 01AN4857026  
Qualified in New York County  
Commission Expires April 28, 2010